

3. At the initial presentment, defense counsel consented to a waiver of his client's right pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure to a preliminary hearing within


14 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially had until August 8, 2018 within which to file an indictment or information.

4. Defense counsel and I have had discussions regarding a possible disposition of this case beginning July 9, 2018, and continuing to as recently as August 7, 2018. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under the Speedy Trial Act expires on August 8, 2018.

5. Therefore, the Government is requesting a 30-day continuance until September 7, 2018, to continue the foregoing discussions and reach a disposition of this matter. On August 7, 2018, I personally spoke with defense counsel who specifically consented to this request.

6. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York  
August 8, 2018

  
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Thane Rehn  
Assistant United States Attorney  
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